

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Robert E. Mathias,	)	Case File No.: 0:20-cv-01014 SRN/LIB
	)	
Plaintiff,	)	
vs.	)	<b>DEFENDANT'S MOTION TO</b>
	)	<b>DISMISS COMPLAINT</b>
Susan Hettich,	)	<b>PURSUANT TO RULE 12(b)(6)</b>
	)	
Defendant.	)	

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Defendant Susan Hettich, by her undersigned attorney, respectfully moves the Court, pursuant to Fed.R.Civ.P. 12(b)(6), to dismiss the complaint filed by Plaintiff Robert E. Mathias. Defendant's motion is made on the ground that Plaintiff has failed to state a claim upon which relief can be granted. Specifically, and as set forth in further detail in the accompanying Memorandum of Law, Plaintiff has failed to adequately allege facts in support of the requisite elements of his claim for defamation or conversion.

The motion will be based on this Motion, Memorandum of Law in Support filed herewith, all records, papers, pleadings, and documents contained in the Court's file in this action, together with such oral argument or other evidence as may be permitted by the Court.

WHEREFORE, Defendant respectfully requests that the Court dismiss with prejudice Plaintiff's Complaint and award Defendant costs, attorney's fees, and any other relief as the Court deems just and proper.

Dated: May 5, 2020.

/s/ Ronald K. Hettich

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